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May 15, 2014

VIA ECF AND HAND DELIVERY

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: In re Motors Liquidation Company, et al. (Case No. 09-50026 (REG))

Reply to Objection to Notice of Settlement of Scheduling Order

Dear Judge Gerber:


Certain plaintiffs designated this firm, along with Caplin & Drysdale, Chartered and Stutzman, Bromberg, Esserman & Plifka, PC as counsel ("**Designated Counsel**") to speak on their behalf at the May 2, 2014 conference and pursuant to Your Honor's instructions at that conference, to negotiate the terms of the proposed **Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 [Docket No. 12690-1] (the "**Scheduling Order**").** Designated Counsel have consulted amongst themselves and with General Motors LLC ("**New GM**") with respect to the **Objection to Notice of Settlement of Scheduling Order**, dated May 15, 2014 [Docket No. 12693] (the "**Objection**") and I write in reply to the Objection as follows:

- (i) Requiring that the form of voluntary stay stipulation be attached to the Scheduling Order as the Objection suggests is counter-productive and will lead to unnecessary delay. There is a tight time-table to coordinate and execute the voluntary stay stipulations by May 23, 2014. There is no good reason to introduce delay to the procedural timeline negotiated by Counsel for the Identified Parties (as defined in the Scheduling Order) and New GM by requiring an exhibit to the Scheduling Order. No Plaintiff (as defined in the Scheduling Order) is compelled to sign a voluntary stipulation.

- (ii) Designated Counsel understand their role and the need to coordinate efforts in the spirit of Your Honor's April 22, 2014 scheduling order and case management orders in this case. The Scheduling Order does not need to address this issue with greater specificity as the Objection suggests. The additional operative paragraphs suggested by the Objection only introduce confusion to the process. If issues relating to the Scheduling Order emerge down the road and the parties cannot work them out amongst themselves, all parties' rights are reserved to raise them with the Court.

Accordingly, we respectfully request that the Court overrule the Objection and enter the Scheduling Order as filed.

Respectfully submitted,



Edward S. Weisfelner

cc: Sander Esserman
Peter Lockwood
Arthur Steinberg
Richard Godfrey
Jonathan Flaxer
Matt Williams
Daniel Golden